

Ms. Esther Barajas-Ochoa
Regulations Coordinator
Office of Environmental Health Hazard Assessment
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1001 I Street
Sacramento, CA 95812
Submitted via Email: esther.barajas-ochoa@oehha.ca.gov

Dear Ms. Barajas-Ochoa:

On behalf of The Scotts Company LLC ("Scotts"), we thank you for the opportunity to comment on the Office of Environmental Health Hazard Assessment's ("OEHHA") proposed No Significant Risk Level ("NSRL") for glyphosate. As you may recall from our October 20, 2015, letter and the accompanying October 19, 2015, letter from Cris Williams and Robert DeMott of Ramboll Environ, we believe OEHHA should not be listing glyphosate as a carcinogen under Proposition 65 in the first place, given OEHHA's own determination that glyphosate does not pose a risk of cancer in humans, and the many studies reaching the same conclusion.

Enclosed you will find a comment letter from Dr. Robinan Gentry and Cynthia Van Landingham of Ramboll Environ. You will see that Dr. Gentry and Ms. Van Landingham evaluate the lead studies on glyphosate (including those relied upon by OEHHA in its proposed NSRL) and conclude that there is no scientific basis for OEHHA to set an NSRL for glyphosate either.

As OEHHA itself has determined, glyphosate is not carcinogenic. Therefore, OEHHA should not be listing glyphosate as a carcinogen under Proposition 65, and if it insists on setting an NSRL for glyphosate, it should be infinite.

Very truly yours,

/s/ Mark J. Sedor

Mark J. Sedor
Manager, Legal